

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE 1, individually, and on behalf of all  
others similarly situated, JANE DOE 2,  
individually and on behalf of all others similarly  
situated, JANE DOE 3, individually and on behalf  
of all others similarly situated, JANE DOE 4,  
individually and on behalf of all others similarly  
situated JANE DOE 5, individually and on behalf  
of all others similarly situated, and JANE DOE 6,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

GOVERNMENT OF THE UNITED STATES VIRGIN  
ISLANDS, FIRST LADY CECILE DE JONGH,  
GOVERNOR KENNETH MAPP, SENATOR  
CELESTINO WHITE, ATTORNEY GENERAL  
VICENT FRAZER, GOVERNOR JOHN DE JONGH,  
SENATOR CARLTTON DOWE, DELEGATE  
STACEY PLASKETT, and JOHN DOES 1-100,

Defendants.  
-----X

**Civil Action No:23-cv-10301-AS**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the Declaration of Annette G. Hasapidis, dated March 26, 2024, the accompanying Memorandum of Law, dated March 26, 2024, Plaintiffs respectfully request that this Court enter an Order from this Court, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, deeming counsel, Annette G. Hasapidis, admitted as of November 22, 2023, the date of filing the Complaint herein,

and for such other and further relief as this Court deems just and proper.

Dated: South Salem, New York  
April 29, 2024

Respectfully submitted,



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Annette G. Hasapidis, Esq.  
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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE 1, individually, and on behalf of all  
others similarly situated, JANE DOE 2,  
individually and on behalf of all others similarly  
situated, JANE DOE 3, individually and on behalf  
of all others similarly situated, JANE DOE 4,  
individually and on behalf of all others similarly  
situated JANE DOE 5, individually and on behalf  
of all others similarly situated, and JANE DOE 6,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

**Civil Action No:23-cv-10301-AS**

v.

**DECLARATION**

GOVERNMENT OF THE UNITED STATES VIRGIN  
ISLANDS, FIRST LADY CECILE DE JONGH,  
GOVERNOR KENNETH MAPP, SENATOR  
CELESTINO WHITE, ATTORNEY GENERAL  
VICENT FRAZER, GOVERNOR JOHN DE JONGH,  
SENATOR CARLTTON DOWE, DELEGATE  
STACEY PLASKETT, and JOHN DOES 1-100,  
Defendants.

-----X

**ANNETTE G. HASAPIDIS**, pursuant to 28 U.S.C. §1746, declares as follows:

1. I am an attorney duly admitted to practice law before this Court and co-counsel for Plaintiffs in this action. As such, I submit this Declaration in support of this motion for an order deeming my admission to this Court, *nunc pro tunc*, as of November 22, 2023.

2. I was admitted to practice in New York State on April 29, 1992. **Exhibit A.** I was admitted to the United States District Court for the Eastern District of New York as of February 4, 1994. **Exhibit B.** Thereafter, I was admitted to the United States Court of Appeals for the Second

Circuit on November 2, 1994. **Exhibit C.** I was admitted to practice in the State of Connecticut on July 26, 2013. **Exhibit D.** I remain in good standing in all of the foregoing jurisdictions.

3. I have an unblemished reputation in the legal community. I have never been sanctioned in any jurisdiction. Nor have I ever been subject to a complaint by any client in any jurisdiction.

4. I have served as appellate counsel to the Merson Law firm since January 2019. Without waiving privilege or confidentiality, I advise this Court that I have worked with the firm in prosecuting this action. During the course of my review of a draft of the Complaint initially filed in this matter on November 22, 2023 (the day before Thanksgiving), I observed that the draft included my firm's name and address block. I removed that address block. Simultaneously, I advised Mr. Merson that I was not yet admitted to practice before this Court, so I could not record an appearance on the docket nor make any filings. I did, however, intend to seek admission to this Court in the New Year.

5. As the Court may note from the Complaint that was initially filed, my firm's name does not appear on the Complaint. However, my name and email address was included in the signature block on the final page of that pleading.

6. There was an extreme urgency in finalizing the Complaint before the revival window (under New York's Adult Survivors Act) for Plaintiffs' claims closed on November 24, 2023, the day after Thanksgiving. Unfortunately, I failed to notice that my name and email address had been added to the Merson Law firm's signature block.

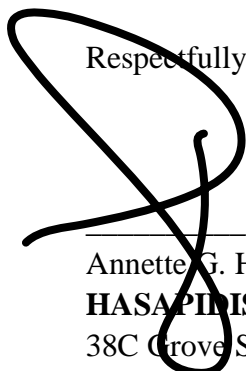
7. I became aware that my name was included on the pleading during the Christmas holiday, due to media articles concerning the lawsuit. After consulting with my ethics counsel, Deborah A Scalise, of Scalise & Hamilton, PC, I began the process for admission to this Court in

January 2024, seeking to waive in through my admission in the Eastern District. I immediately secured a sponsor and spent two months, *inter alia*, completing and filing the application, securing the certificates of good standing from New York State, Connecticut and the Eastern District Court, and obtaining the requisite information from my sponsor. My application was accepted on March 13, 2024 and I was admitted on that day. **Exhibit E.**

**WHEREFORE**, for the foregoing reasons, the undersigned respectfully requests that this Court grant the motion and enter an order deeming her admission to this Court, *nunc pro tunc*, as of November 22, 2023, together with such other and further relief as this Court deems just and proper.

Dated: South Salem, New York  
April 29, 2024

Respectfully submitted,



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